

North American Numbering Council
Meeting Minutes
January 18-19, 2000 [draft 2.24.00]

I. Time, Date and Place of Meeting. The North American Numbering Council held a meeting commencing at 8:30 a.m., at the Federal Communications Commission, 445 12th Street, SW, Room TW-C305, Washington, DC.

II. List of Attendees:

Voting Council Members:

1.	Beth Kistner	ALTS
2.	Ed Gould	AT&T
3.	Dan Hochvert/Jim Castagna	Bell Atlantic
4.	Terry Monroe	CompTel
5.	Ron Binz	CPI
6.	Lolita Smith	CTIA
7.	Norm Epstein	GTE
8.	Peter Guggina/Karen Mulberry	MCI WorldCom
9.	Erin Duffy	NARUC
10.	Vincent Majkowski	NARUC
11.	Joel Cheskis	NASUCA
12.	Natalie Billingsley	NASUCA
13.	Beth O'Donnell	NCTA
14.	Elizabeth Lynch	Nextlink
15.	Seth Jones	Nextel Communications
16.	Ray Strassburger	Nortel Networks
17.	Karen Westrick	Omnipoint
18.	Trent Boaldin	OPASTCO
19.	Harold Salters	PCIA
20.	Bill Adair	SBC
21.	Ron Havens	Sprint
22.	John Hoffman	Sprint PCS
23.	Roberta Breden	TIA
24.	Tony Pupek	USTA

Special Members (non-voting):

John Manning	NANPA
Maria Estefania	ATIS

Commission Employees:

Diane Griffin Harmon, Designated Federal Officer (DFO)
Jeannie Grimes, Alternate DFO
Charles Keller, Chief, Network Services Division (NSD), Common Carrier Bureau
Les Selzer, NSD, CCB
Craig Stroup, Industry Analysis Division, CCB

John Spencer, Policy Division, Wireless Telecommunications Bureau (WTB)

III. Estimate of Public Attendance. Approximately 42 members of the public attended the meeting as observers.

IV. Documents Introduced.

- (1) Agenda
- (2) November 16-17, 1999, NANC Meeting Minutes (draft)
- (3) December 22, 1999, Conference Call Meeting Minutes
- (4) Chief, Network Services Division letter to Commissioner Majkowski
- (5) North American Numbering Plan Administration Report
- (6) 1999 COCUS and NPA Exhaust Analysis – Update
- (7) NeuStar January 12, 2000 ltr re: 2000 COCUS
- (8) NANPA Oversight Working Group Report
- (9) NRO Working Group Pooling Monitoring Project
- (10) NRO Working Group Report, re: COCUS
- (11) LNPA Working Group Report
- (12) Wireless Number Portability Subcommittee Report (WNPSC)
- (13) WNPSC Report, Key Issues & Action Items
- (14) LNPA WG Slow Horse Subcommittee Status Report
- (15) Cost Recovery Working Group Update
- (16) Industry Numbering Committee (INC) Report
- (17) Draft NANC letter to INC, re: Reporting of Resellers' Code Usage
- (18) INC NANC Expansion Workshop Status Report
- (19) Letter to NANP regulators, Re: INC Interim NANP Expansion Report, INC 99-1210-025 (rev. Dec. 10, 1999)
- (20) Ad Hoc Telecommunications Users Committee letter to NANC, January 14, 2000
- (21) NBANC NANPA Fund Performance Status Report & Funds Projection
- (22) NBANC True-Up Process for 16-Month Year 3 Period
- (23) Telcordia tutorial re: Code Opening, NPA Relief, and Traffic Routing Administration
- (24) Table of NANC Projects/Activities

V. Summary of the Meeting.

A. Opening Remarks. Chairman John Hoffman provided opening remarks. American Mobile Satellite Corporation has resigned its seat effective January 1, 2000. NANC members were reminded to forward their signed NANC contracting integrity certification to Diane Harmon or Jeannie Grimes. The certification was e-mailed to NANC members on December 29th.

Chairman Hoffman announced that Vince Majkowski will be leaving the Colorado Commission at the end of January and will therefore no longer participate on the Council. Charles Keller, Chief, Network Services Division presented Commissioner Majkowski

with a letter of thanks on behalf of the Common Carrier Bureau for his service and contributions to the Council. The letter was read into the record.

B. *Approval of meeting minutes.* The November 16-17, 1999 meeting minutes were adopted without modification. The December 22, 1999 meeting minutes were adopted as amended by minor typographical edits provided by Ed Gould, AT&T.

C. *North American Numbering Plan Administration (NANPA) Report.* John Manning, NANPA, presented the report to the Council addressing the New York 914 NPA relief plan; the NPA Exhaust Analysis; COCUS 2000; the California Lottery; and details of the NeuStar NANC support provided to date. The handouts provided are also available on the NANPA.com web site.

New York 914 NPA Relief Plan. On November 9, 1999, NANPA received the request from New York for a code, but did not assign the code because the relief plan proposed a two-way geographic split along county boundaries resulting in the splitting of certain rate centers in violation of industry guidelines. Additionally, this request was inconsistent with the NANC position stated in the August 26, 1999 letter to the Chief, Common Carrier Bureau (CCB) regarding area code splits that split rate centers. The NANPA sought direction from the NANC on November 16, 1999. The NANC directed the NANPA not to release a new area code for implementation of a two-way geographic split in the existing 914 NPA in New York. The NANC advised the Chief, CCB, of its actions by memorandum. By letter of November 18, 1999, the New York PSC requested that the FCC direct NANPA to release a new code to provide relief for the 914 NPA. In response, on December 3, 1999, the Chief, CCB advised Lawrence G. Malone, General Counsel, NYDPS Commission, that the requested code would be released and directed the NANPA to so. Accordingly, NANPA assigned the 845 NPA pursuant to the implementation plan and schedule.

Chairman Hoffman commented that he is scheduled to meet with Larry Strickling, Chief, CCB, regarding the Bureau's decision to reverse the NANC on this matter, and to seek guidance on the NANC's role going forward with respect to providing instructions to the NANPA on such matters. Chairman Hoffman will report back to the Council at the next meeting.

1999 COCUS and NPA Exhaust Analysis. Updates to the 1999 COCUS and NPA exhaust analysis results were presented to the Council at its May 26, 1999 meeting; the survey included data through April 1999. NANPA made a commitment to continue to provide regular updates on CO code assignments and the impact on area code relief, rather than waiting another year for the next COCUS survey. Since April, monitoring each individual NPA based upon the actual number of CO codes assigned versus the forecasted amount assigned. Many discrepancies between the NANPA data (*i.e.*, what is shown in the LERG) and data received from the former code administrators have been found. There are also a number of NXXs that were under investigation or needed further clarification as to whether they were assigned. There was a follow-up on numerous instances where a Part 4 was not on file; this process is still ongoing. These efforts with

the cooperation of a number of service providers have resulted in the recovery of CO codes. Some codes previously identified as unavailable for assignment have been put back into the inventory for assignment to service providers.

The handout covers the historical assignments from April 1, 1999 through November 30, 1999 and the chart is sorted by NPA, state and exhaust date. It compares the April 1999 COCUS results with the December 1999 (cumulative) actual data collected through the CO code application and assignment process. NANPA looked at the average code demand per month, for “spikes” in assignments, and whether there were indications of new entrants coming into the market. Other items considered are the number of service providers, rate centers in the area code, whether CO code rationing was in place, and whether there was any recent NPA relief activities planned or underway. All these items were factored into the update.

The last three pages of the report contain a list of NPAs where the forecasted exhaust date is based on a rationing level. This is provided to show the number of area codes NANPA forecasted, based on the CO code rationing number, in that particular area code. Additionally, there is a list of area codes that are either new NPA exhaust projections, new codes that did not exist in the April 1999 report, or NPAs that were impacted by relief, that is, those area codes that had the introduction of a new NPA and therefore the exhaust date were moved outward.

With respect to the +/- symbols, in this case the (+) symbol is bad and a (-) minus is good. Positive means the exhaust date is moving closer and the negative means it is moving out. This is based on number of years. Where the delta is plus or minus 4 years, NANPA provides an explanation as to why. For example, a 2.5x increase in a code growth rate means that the actual code growth rate over the over the last 8 months was 2.5 times what was forecasted. If an NPA has been “capped” in an overlay situation where there are no codes left, the code is not having normal CO code assignments made out of it. However, there are instances where codes are returned and become available.

Where overlays are indicated, the chart shows what NPA codes correspond to the same geographic area. There are three unique situations in the U.S. where “concentrated” overlays exist; two in Florida and one in Oregon. In Florida, the 305 and 786 NPAs cover all in the Florida 305 area, 786 covers all of 305 with the exception of the Florida Keys; that portion is identified as 305A in the report. The chart indicates the introduction of relief in an NPA as a new area code which was not in the April 1999 COCUS that is up and working or will be shortly.

Tony Pupek, USTA, asked, where there is a -1 or -2 in the “notes” column, what is the reason for the change? John Manning explained that they looked at codes unavailable and that the numbers reflect some true up of records from service providers. Also, some are a result of a slight decrease in the CO code demand rate that resulted in a year or two change. In a few instances, rationing may have been implemented where in the past there was no rationing.

Norm Epstein, GTE, asked what NANPA has done as a result of the adjustments to the data, and what does this mean in terms of lessons learned. Mr. Manning stated that NANPA thought it had a very good plan to anticipate unforecasted exhaust. In some instances, it worked very well where jeopardy did not have to be declared, but it allowed NANPA to begin the NPA relief planning process. However, a service provider can request, *e.g.*, 60 initial codes at once and as a result an area code would most likely have to go into rationing. Absent setting aside a large amount of codes, NANPA will still have to respond to new service providers who obtain codes to establish their footprint.

Chairman Hoffman observed that in the case of Missouri, an area code proceeding was commenced and a relief plan developed based on the April 1999 COCUS data. Mr. Manning explained that the projected exhaust date was predicated on projected new service provider demand, and in some instances, the dates were moved out when the new entrant projection did not materialize. NANPA will continue to look at data in three-month windows, which will aid in getting closer to identifying an area code that requires relief to avoid starting the planning process too soon.

Chairman Hoffman commented that big swings with the projected exhaust dates create a credibility issue; some projections are pushed out 13 years from a forecast of eight months ago. Forecasting exhaust dates is not an exact science, but there are a whole lot of people that are relying on the numbers that get published. Missouri, *e.g.*, started a proceeding because of NANPA's projected 2nd quarter 2001 exhaust date; that date has been pushed out to 2004. Chairman Hoffman suggested that a disclaimer should be added to the reported data to caution state commissions that the numbers (and results) are the best available at this time, but are subject to change. Mr. Manning stated that the assignment rates in some codes that have been in rationing for a long time are unknown and that they could only guess as to when those codes would exhaust; he added, that the disclaimer, therefore, is a good idea. Vincent Majkowski pointed out that other variables, such as rate center consolidations, implementation of thousand block pooling, etc., can extend and cause change to the projections.

The Council agreed to work on drafting a disclaimer for the report off-line, stating the importance of getting the revised COCUS information up on the web site with the disclaimer attached.

COCUS 2000. On January 12, 2000, NANPA released a letter soliciting the participation in the 2000 COCUS of all central office code holders. All responses to the survey are due by March 1, 2000. Industry Numbering Committee (INC) resolution states that if a COCUS is not on file with NANPA by March 15th, the assignment of resources will be suspended until such time as the service provider complies. This should improve forecasting. The INC is trying to get service providers to provide data. Information is available at the www.nanpa.com web site and service providers may submit COCUS input via the web site. In response to a question regarding what happens if an unreliable forecast is filed, Mr. Manning explained that in the past, NANPA has contacted the service providers to verify the information. However, NANPA is not in the position to judge whether they are right or wrong. Mr. Manning was requested to verify whether the

2000 COCUS was collecting utilization data, as suggested in paragraph two of the cover letter which states that the total number of active telephone numbers within the central office codes assigned to an entity are to be reported. Mr. Manning will verify and report back to the Council.

California Lottery. The California Public Utilities Commission (CPUC) has requested that NeuStar submit a bid to conduct the California lottery, which is now performed by the CPUC's Telecommunications Division. NANPA developed a bid response and has held discussions with the CPUC. California is examining how it may more closely model its lottery after other state lotteries. NANPA currently performs lottery processes for some other states. CPUC is looking for a method of funding. Under the NANPA requirements document, work performed beyond the scope of the requirements document as an enterprise function must be approved by the NANC, as well as the cost associated with the proposed service, before NANPA may proceed. At this point, NANPA is not seeking a decision from NANC, but will in the near future as the scope and requirements are finalized with California. This service may result in a charge to California service providers; however, the method of funding and collection is still under discussion.

Chairman Hoffman commented that he had conferred with the Diane Harmon and others at the FCC and agreed that if California would like NeuStar, as the NANPA, to act as its lottery administrator, the service would be classified as an enterprise service. It is clear that California may not impose costs on other service providers in other jurisdictions, and therefore recovery under the NBANC formula would be inappropriate. Chairman Hoffman further noted that at this time, the matter of approving an enterprise service is not ripe for further discussion and decision by the NANC

Helen Mickiewicz, CPUC, clarified that the perception that the CPUC was suggesting that service providers outside of California pay for their lottery is incorrect. California is simply trying to figure the best way to fund the lottery. The NeuStar bid response proposal suggested the CPUC do the billing, which will involve adding commission staff. The CPUC is interested in finding another way to do the billing. Vince Majkowski indicated that collection for California under the NBANC formula would be outside the scope of NBANC's services.

NeuStar NANC Support. The NARUC funding account has been established at NeuStar. Chairman Hoffman sent invoices to companies who requested billing in December for end of the year budget purposes. Members should contact Chairman Hoffman if they require an invoice to facilitate their voluntary contribution payment to NARUC fund. Additionally, a calendar of working group meetings is posted on the NANC Chair web site (www.NANC-Chair.org).

D. NANPA Oversight Working Group Report. Pat Caldwell, Co-Chair, provided the report to the Council. Under the NANPA performance improvement plan there are a few items that require ongoing review: the mandatory enterprise services audit, internal quality measurements, and improvement of administration tools, *e.g.*, an Oracle-based assignment system is in place and improvements to the workflow management is

ongoing. All other elements of the 1998 evaluation are closed; however, the intellectual property rights matter remains open. The WG is working closely with NANPA to identify IPR items and reach agreement on the differing views of what should be included in the inventory property list.

The NANPA 1999 performance review survey was distributed on January 3, 2000 through several industry association channels as well as NARUC. Analysis will take place during first week of April. Surveys are due back by March 10th. Input from the survey will be included in the final report to be presented at the May 23-24, 2000 NANC meeting.

The first draft of the Auditor Requirements Document has been completed and the WG has created a timeline with the specific steps to complete the requirements and bidding process. The WG will continue to refine this first draft during its January meeting.

Updated NANPA Requirements Document. The WG is on track to begin work at the end of 2Q00 on the new NANPA Requirements Document. The current NANPA contract expires November 2002. Chairman Hoffman noted it was reasonable to allow the WG 3-4 months to come up with timeline and project work plan. There was no objection. The WG is holding its February 15-17 meeting in Concord, California and will visit the NANPA central office code administration offices as part of the 1999 evaluation process.

E. Number Resource Optimization Working Group Report. Beth O'Donnell, Co-Chair, provided the report to the Council on the pooling monitoring project. The NRO provided a matrix containing the NPAs in which pooling is planned or is already in place. Currently, there are eleven states that have been granted authority for pooling trials, but only 4 states have identified a specific NPA(s) to begin work on development of a trial, to date. Individual NRO WG participants have been assigned to track and monitor state activities, and at this time only four states responded with matrices. There are 12 other states with pending petitions for additional authority.

The matrix is broken into 4 sections – the NPA profile; trial specifics; results to date and a miscellaneous section. The 847 NPA is the only one with which there is “results to date” at this time. The miscellaneous section contains a question as to whether there were any deviations from the INC pooling guidelines. In the FCC delegated authority orders, states were given the right to deviate as necessary as long as they sought input from the industry. The biggest deviation thus far is the use of the Illinois guidelines instead of the INC guidelines.

The NRO is discussing what to report to the Council on a monthly basis. There is very little data on results at this time. Ms. O'Donnell asked for suggestions from the Council as to what it would like to see highlighted in the matrix. Chairman Hoffman praised the NRO WG for its detailed matrix and stated that reporting on the trials will be very helpful. Chairman Hoffman also encouraged the NRO to continue to work on the miscellaneous section, particularly the “problems and successes encountered.” Beth

Kistner, ALTS, added that the monitoring tool exceeded her expectations and complimented the NRO on its work product. As more trials commence, it will require more effort to keep up, but having the matrix will be beneficial. Ms. O'Donnell stated that the most difficult part to fill out has been the NPA profile data. Trina Bragdon, Maine Public Utilities Commission, who coordinates the State Group that meets weekly, has been very helpful in answering questions on the NPA profile. The other information has been extracted from the numberpool.com web site and inserted in the NRO matrix.

In response to Chairman Hoffman's question whether the NRO is coordinating with the NANPA, Ms. O'Donnell stated the NANPA participates in the conference calls. Additionally, several state commissions have been queried and if a state has ordered pooling, NRO has completed its initial assessment.

Helen Mickiewicz, CPUC, suggested that the narrative description under California in the matrix was incorrect and offered an edit to more accurately reflect the language in paragraph 19 of the FCC order delegating pooling authority to the CPUC. California is conducting pooling in one NPA (310) in the Los Angeles MSA. The Los Angeles MSA contains more than one NPA, but at this time the CPUC has only ordered a trial in the 310 NPA. Chairman Hoffman suggested the NRO edit out "apparently" and insert "initially" and it was agreed that the phrase "...in spite of that Order" be deleted. Ms. O'Donnell agreed, and added that the matrix will be edited as suggested, and that sections B&C will change on a monthly basis.

There was discussion concerning how to measure "success" and several members voiced opinions. Does it mean adding 6 months to the life of an NPA? Collection of quantitative data over time will assist, but Chairman Hoffman pointed out that this will be a moving target.

Joel Cheskis, NASUCA, asked the NANC to apply the success question to the matrix as a tool. The NRO is looking for guidance -- does NANC think there is something that should be tracked from the beginning that is not on this list now? At this time, no additional data elements were suggested.

Jim Castagna, Bell Atlantic, noted that one definition of success with respect to the pooling trials will be whether or not the industry is ready when it comes time for the national roll out. Another measure of success in the future is how or whether pooling extended the life of the NANP. The Matrix is posted on the NANC-Chair.org web page.

Tony Pupek asked how far should NANC and the NRO go with monitoring the trials before getting to a national roll out. If 40 states obtain authority for trials, will NRO track it? This could become enormous. Chairman Hoffman stated that this is a good question, but this early in the process and at this time, we need all the information that can be gathered. Diane Harmon, Designated Federal Officer, stated that the delegation orders made it clear, when a national pooling scheme is in place the state "trials" will be eliminated. The Optimization *Report and Order* will address the pooling issue.

COCUS Work to Date. Mike Whaley, NRO Co-Chair, presented the update on the COCUS Hybrid requirements development. The NRO has begun its initial evaluation at a high level, accepted contributions, and discussed a few key points and assumptions. A few of the basic assumptions are as follows: (1) Carrier forecasts should be the primary driver for NPA and NANP exhaust projects; (2) an average growth factor should be developed to use as an initial reasonableness test of a carrier's forecast; (3) the historical growth factor developed will be used as a secondary reasonableness test of the forecast, and (4) new entrant footprint and expansion forecasts should be automatically accepted with limited review by the NANPA.

The NRO is also recommending a comparison of utilization data to another set of correlative data that shows growth over a period of time, "time series analysis," which uses external variables to help evaluate what the growth is when the model is developed. Additionally, the new tool should also include some kind of impact on pent up demand after an NPA has been in jeopardy prior to the relief process taking place and exhaust calculations being made. These are some of the basic discussions that are still taking place at the NRO.

As next steps, the NRO will develop a work plan with dates and objectives of the requirements document. The WG has been meeting via conference call and has scheduled calls through June 2000. Mr. Whaley stated that the conference call meetings address a mix of issues, not just the COCUS requirements document development.

F. Local Number Portability Administration (LNPA) Working Group Report. Shelly Shaw, Co-Chair, provided the report to the Council. Anna Miller provided the Wireless Number Portability Subcommittee (WNPSC) status report with an update on three key issues. The WNPSC discussed the need to support the jurisdictional information parameter (JIP) to identify the originating switch for certain types of billing (*see* matrix item 3H) and agreed that a liaison will be sent to T1S1.6, TR45.2 and T1P1.5 requesting that JIP be made a wireless requirement to support billing. The CTIA Number Advisory Group has approved the wireless inter-carrier communications report for distribution (*see* matrix item 2H). A draft test plan template has been completed for turn up and wireless to wireless inter-carrier testing. Conference calls are scheduled through February to complete the test scripts. Ms. Miller also reported that Jim Grasser has resigned as Co-chair and the WNPSC is now accepting nominations for his replacement. With regard to the Wireless Number Portability Report, the section assignments and are to be submitted to Anne Cummins, who is the report editor, by February 21, 2000.

LNP Problem Identification and Management (PIM). Ms. Shaw reported that PIM has now closed 2 issues, has 2 open issues and just accepted a new issue. All PIM issues are tracked on the open PIM issues list which is located on the LNPA WG web page. The next LNP WG meeting will be held in San Francisco, from February 14-18, 2000.

NPAC/SMS Release Status. The Requirements development for Release 4.0 are in the final stages and the final package of change orders should be presented to the LLCs on February 24th. The Number Pooling Subcommittee will review the test case and

development of a testing strategy for Release 3.0. Currently, Release 3.0 is on track for testing and implementation.

Slow Horse Update. Steve Addicks, MCIWorldcom, provided the status report and background regarding the recommendation to change the broadcast timer cycle in the NPAC. When the NPAC broadcast attempts to send to a service provider information about a ported number, it sends a message and waits up to 5 minutes for an acknowledgement. If it is not received, the NPAC broadcasts again, waits another 5 minutes, and if it still has not received an acknowledgement, it broadcasts a third time; if there is still no acknowledgement, it drops the association of the service provider's system of the LSMS. This timer is called a 3x5.

The WG has recommended a change to the NPAC timer from 3x5 change to a 1x15. It would reduce the loads on the service providers' systems, and should improve system availability. After 3 attempts and a drop, the service provider's system is effectively offline until the service provider realizes that it has been dropped and attempts to re-associate. This is a resynchronization process. A partial failure list is maintained by the NPAC. Changing the timer to a more tolerable level will reduce the load on service providers and reduce the times that service providers might be disassociated from the NPAC. The current system is not affording adequate response time and the LSMSs are not getting the data on ported numbers. The LNPA WG sent a message to LLCs regarding this problem and recommended the 1x15 timer solution. The acknowledgement of the broadcast is the problem. The message is received but the networks are not able to respond in time, therefore LSMS subsequent broadcast will also fail.

With regard to the LSMS availability requirement, the Slow Horse Committee has made some progress on writing that requirement. There is still an open question on the LSMS performance requirement of what the peak broadcast value is. Some vendors question whether "peaking value" is an important issue, and suggest that there may be some different ways to write the requirement. This will be discussed at the next subcommittee meeting.

G. Cost Recovery Working Group Report. Elsa Morris, Co-Chair, provided the report to the Council. The CRWG was charged at the November meeting with developing a dollar estimate for the NBANC to use to develop a carrier contribution factor for billing and collection for fiscal year July 1, 2000 to June 30, 2001 (FY 2001). This was for the COCUS replacement. The dollar estimate would be for the first year's payment. The NBANC plans to submit the filing for FCC approval by the first week of May 2000. The CRWG calculates that it needs to provide dollar estimates to the NANC for approval no later than the April 25-26 meeting, in order to subsequently provide the figure to the NBANC prior to its filing deadline with the FCC. The CRWG has sent a memo to the NRO WG seeking cost elements of the planned COCUS replacement tool.

Ed Gould, AT&T, questioned whether there would be additional carrier cost on an ongoing basis, beyond the initial development costs assessed, as a result of the new COCUS because of more work by the NANPA to analyze the data. Anne La Lena, Co-

Chair, responded that the question may be premature, but increased carrier cost is a distinct possibility. The CRWG has come up with several cost categories, but at this point it is unknown.

H. Industry Numbering Committee (INC) Report to the NANC. Shawn Murphy, INC Moderator, provided the report to the Council. Mr. Murphy reviewed the list of INC workshops and meetings held since the last NANC meeting. The INC 47 was held January 10-17th. During the LNPA workshop, the Thousand Block Pooling Administration Guidelines were reissued, dated January 10, 2000. There are still 5 open issues on the pooling guidelines that need to be resolved. The goal is to close the issues and release an updated version of the guidelines by April 1, 2000. The current document is available on the ATIS web site at <http://www.atis.org/atis/clc/inc/incdocs.htm>. Also, during the LNPA Workshop, Issue 177 Unassigned Number Porting (UNP), was addressed. There are nine contributions that will be addressed during the February interim meeting. See handout #16 for a complete list of meetings.

Mr. Murphy stated that no contributions have been received on Issue 164, Individual Telephone Number (ITN) pooling.

With respect to the scope of development for UNP, questions were raised as to what the INC going to do with it – there needs to be an agreed upon architecture in order to develop guidelines and administrative practices. However, right now the INC is focused on the 1K pooling guidelines.

Beth Kistner, ALTS, stated that there are substantial policy issues to be dealt with regarding UNP and questioned whether the INC has decided to go down a path for a narrow architecture. Norm Epstein stated that GTE would like to see this issue worked, and for the Council to come up with an agreed upon definition of what the concept really means. Peter Guggina stated that with regard to UNP, there is a need for a policy decision at the national level which allows for the porting of unassigned numbers.

It was noted that INC does not have a target date to return to NANC with a UNP definition and that the NPRM does not address UNP beyond listing it one of the many optimization tools contained in the NANC NRO Report. Tony Pupek stated that the INC will report back to NANC at the March meeting, and added that the FCC has already provided guidance in the NPRM. Chairman Hoffman stated that the concept needs to be fleshed out a little more. Beth O'Donnell clarified that during the development of the NANC NRO Report, the Working Group simply ran out of time and was not able to fully explore UNP and its potential uses. Therefore, the FCC did not have much of a record on the matter. Ms. O'Donnell opined that UNP is an optimization method that gets at the embedded resource.

Diane Harmon, DFO, stated that there was a lack of information on UNP – beyond understanding that it was another way to break down the blocks of numbers. In selecting optimization methods to focus on, the Bureau considered how soon we could implement UNP. More information would be desirable on this matter.

Audit Workshop Update. Mr. Murphy stated that the INC has drafted a new section for the CO Code Guidelines on audits. The goal is to incorporate Audit Framework into the CO Code Guidelines by the end of the 2Q2000.

INC has requested clarification from the NANC on its recommendation regarding the collection of utilization data from resellers; specifically, whether data should be collected from resellers with 1000 sequential TNs, or a total of 1000 TNs. Chairman Hoffman suggested inserting “sequential” in the NANC recommendation. Vincent Majkowski and Gilbert Orozco agreed that it should be sequential based on their earlier work on this issue as an IMG. There was no objection to the change from the full Council.

NANP Expansion Workshop Update. Norm Epstein provided the review of the status report on the Interim INC NANP Expansion Report, which was released on December 10, 1999 to regulators in the North American Numbering Plan. A larger document, referred to as the reference document in the context of the report, is available. The INC is continuing to accept contributions and has received a recent contribution from U S West. The objective is to select a single option, but an agreement is needed from all the NANP member countries. The expansion plan will need a transition plan. Confirmation of the INC assumptions is needed and if no feed back is received, then it will be assumed that there is agreement with the INC assumptions.

The INC has made the following key assumptions. Prior to NANP expansion the INC Uniform Dialing Plan will be approved and implemented throughout the NANP. This is 10 digit dialing and the elimination of the current use of the prefix “1”. Next, the release of the “D” digit will not occur prior to the NANP expansion. The two proposed network changes are not independent of one another. When the “D” digit is released, Central Office codes beginning with either 0 or 1 will be introduced and the network will no longer be able to support seven digit dialing.

There was discussion concerning the assumptions and the policy issues that they raise. Karen Mulberry stated that the NANC should come up with a clear decision. As an aside, Ms. Mulberry noted that in the United Kingdom, the dialing plan has undergone several expansions. Chairman Hoffman noted that the FCC is an addressee on the ATIS letter and recommended forming a special IMG to come up with a suggestion for the FCC. Vince Majkowski emphasized that this is an *interim* report, which has generated a number of concerns, but it is not the gospel. Mr. Epstein added that the expansion study has been going on for 4 years and he will go back to the INC to obtain an end date.

The Council agreed to form an IMG for the purpose of developing a response that can be recommended to the full NANC and if approved, forward to the FCC to consider in its response to the ATIS letter. Chairman Hoffman appointed Trent Boaldin and Beth Kistner as co-chairs. The following volunteered to be participants on the IMG: Adam Newman, Telcordia; Ron Havens, Sprint; Julie Petersen, SBC; Eleanor Willis, WinStar; Lori Messing, CTIA; Rose Bredenbaugh, WinStar; Mike Whaley, U S West; Norm

Epstein, GTE; Karen Mulberry, MCIWorldCom; Ed Gould, AT&T; Jim Castagna, BellAtlantic, and Ron Binz, CPI.

The Expansion Assumptions IMG will report at the next NANC meeting with a work plan and deadline to prepare a draft recommended response to the December 10, 1999 ATIS letter to the 19 NANP member country regulators. The purpose of this IMG is to assist the FCC with developing a response to the ATIS letter.

Chairman Hoffman noted that the NARUC Winter meeting is coming up in March. JoAnne Sanford will be here next month. INC has attached a 1994 NARUC resolution, which still stands, to the INC Interim NANP Expansion Report. Natalie Billingsley pointed out that the area code issues today are very different from what they were in 1994.

Chairman Hoffman stated that the AdHoc Telecommunications Users Committee letter of January 14, 2000, to NANC deserves a response. The AdHoc letter expresses its concern that the INC document "...appears to accept NANP exhaust as a given, and the need to introduce additional digits into NANP telephone numbers as inevitable." A NANC response to AdHoc should emphasize that the INC expansion study is being worked in parallel with, and not instead of, numbering resource optimization measures. Norm Epstein volunteered to prepare a first draft for the Chairman's review.

I. Number Pooling IMG Report and Recommendation. Peter Guggina, IMG Chair, provided the report to the Council. The IMG has reached acceptance of the NeuStar proposal and has determined that it is consistent with the Requirements Document, finalized on the December 22nd NANC conference call. Mr. Guggina stated that this is the final analysis and suggested closure and discussed next steps. Copies of the proposal were delivered to Chairman Hoffman and Diane Harmon, FCC, during the meeting.

Chairman Hoffman complimented the IMG and stated he was very impressed with their work. Chairman Hoffman stated he is not ready to ask NANC to approve the IMG's recommendation and the NeuStar proposal until the issue of the non-disclosure agreement (NDA) requirement is resolved. The response must go public for all the NANC members and suggested that the Legal Expertise WG should review the proposal and provide a top down summary. Chairman Hoffman further opined that if the NANC is going to approve this deal, it should make the price public, but first it must resolve the non-disclosure issue by eliminating the need for the NDA. Joe Franlin, NeuStar responded that he would like to take the matter back to their Counsel. Greg Roberts, NeuStar stated that a redacted version of the proposal would be provided.

Peter Guggina stated that the IMG will follow up with a memorandum to the NANC summarizing the work and recommendation. Lolita Smith, CTIA stated that it would be necessary to at least review the redacted version of the response to the requirements document before the full Council could complete its recommendation to the FCC in addition to reviewing the IMG report and recommendation. Mr. Guggina responded,

speaking as the MCIWorldCom NANC representative, that this is complex document, which the IMG introduced to the Steering Group in slices. At any time, any NANC member who signed a non-disclosure agreement could have reviewed it – but keep in mind that the FCC is working on an early spring order for number pooling. Ed Gould echoed Mr. Guggina’s concerns, adding that review of the documents was expected by all Council members and available for review if members signed a non-disclosure agreement.

Chairman Hoffman commented that the NANC assigned this to the IMG and they have done a remarkable job. Their recommendation is to accept the proposal. The NANC will not renegotiate provisions of the contract. The NANC needs to see a summary describing what the IMG has done and what the recommendation provides, in an outline, so everyone understands and can reach a level of comfort. It would be helpful to resolve non-disclosure agreement matter and to give the Legal Expertise WG a few days to go through the bid response. Peter Guggina suggested that the IMG report key points in the document, including confidential information, in anticipation that the confidentiality issue is resolved.

Next Steps. Resolve non-disclosure agreement issue with NeuStar by the end of the week. Allow the reconstituted Legal Expertise WG an opportunity to review the response and identify any legal jeopardy that that has not been recognized by the end of the next week. The IMG will provide everyone with a report summary by early next week. NANC members will have an opportunity to ask questions and possibly vote on the recommendation between now and the next meeting. Diane Harmon suggested that the NANC act before the February 22-23, 2000 meeting.

J. *Oversight of Limited Liability Corporations (LLCs) Number Portability Administration Center (NPAC) Activities.* Pamela Connell, AT&T, was present to answer questions. There were no questions. Going forward, Chairman Hoffman requested an LLC activities update at each NANC meeting.

January 19, 2000

K. *North American Billing and Collection Update.* John Ricker, Chief Executive Officer, NBANC, provided the report to the Council. Mr. Ricker reviewed the NANPA Fund Year 3 factor development for the period March 2000 through June 2001, which resulted in a new factor filed on November 22, 1999 with the FCC for approval. The factor was approved on December 30, 1999; a copy of the *Order* approving the factor is attached to the handout provided. The new factor is 0.0000577 and supports the net domestic funding requirement of \$15.6M, based on a 6-month revenue data collection on FCC Form 499S. The new reporting form, 499A (effective April 1, 1999) provides more extensive industry information and revenue data. With the use of Form 499A, reported revenues are expected to be higher and more accurate than the September 1999 data collection. All carriers must file the FCC Form 499A.

NBANC will go through a “true-up” process in April 2000 to test the new revenue data to determine if a change in the revenue base necessitates a modification of the 0.0000577

contribution factor. It is assumed that a new factor will be needed. By May a revised factor will be filed with the FCC with approval expected by the end of June. The payments due July 12 will reflect the revised factor. The new factor will be applied to the newly reported revenues of every carrier billed in February for Year 3 funding. The difference in what was paid based on the 0.000057 factor and what is owed based on the revised factor will be calculated. As a result, carriers who made a one time annual payment on March 12 will be billed for the balance owed if the revised factor results in a larger contribution requirement. Refunds will be issued in the opposite case. Carriers which pay monthly will see adjustments up or down depending on the impact of the new factor. In the case of *de minimus* carriers who previously owed only the minimum contribution requirement of \$25, a larger revised factor will result in bills issued for a balance owed. The handout provided included examples of various payment adjustment scenarios. The disbursement schedule for the payments to NANP Administration is included in the handout.

In January 2000 the NBANC staff will write to the Caribbean nations and telephone companies and the Canadian regulatory authorities to explain the Year 3 funding process and explain their contribution amount for the 16-month period.

Mr. Ricker provided the NANPA Fund Performance Status Report to the Council in a handout. The current fund balance is \$918K; projected receivables are \$306K; payments to Lockheed/NeuStar to date total \$3.57 million with \$713K remaining. Payments to NECA to date total \$234K with \$43K remaining. Board expenses to date total \$12,475 with \$12.5K remaining. Payments to the external auditor, PricewaterhouseCoopers, in year one total \$19,250, with year 2 payments estimated at \$22K.

Mr. Ricker extended his thanks and appreciation for the service Commissioner Majkowski provided as Chairman of the NBANC Board, and stated that Vince's hard work on the Board resulted in a very smooth NBANC process.

L. LERG Tutorial. Adam Newman, Telcordia Technologies, provided a comprehensive handout and detailed presentation to the Council in response to an action item from the November NANC meeting. An electronic copy of the handout is available by request from anewman@telcordia.com. The NANC invited Telcordia to give a presentation on how the local exchange and routing guide (LERG) operates, the traffic routing procedures, and how data is kept up to date.

Mr. Newman reviewed the code opening, NPA relief and traffic routing administration (TRA) topics as they relate to Telcordia and its interface responsibilities with NANPA. With respect to NPA relief planning, pursuant to the INC guidelines, the NPA relief coordinator makes arrangements with Telcordia's TRA to update the Routing Database System (RDBS) and other systems. TRA provides basic routing and rating data covering the public switched network. It serves as the focal point for inter-company exchange of pertinent routing and rating data. The RDBS and the LERG reflect the current status of central office codes. Timely reporting of data by code holders is essential. An output of

RDBS is the LERG, which contains all the RDBS data. For further information and detailed explanation of these processes, see handout #23.

M. Steering Group Report. Vince Majkowski, Co-Chair, SG, provided the report to the Council. Tony Pupek reviewed the revised NANC projects/activities matrix. Item 4 on the matrix, NANP expansion policy issue decisions, was assigned to the “Assumptions” IMG. Item 11, development of pooling guidelines, was updated to reflect the next INC update in April 2000. Item 17, development of audit guidelines, added CO Code guidelines to be incorporated by 2Q2000. This matrix will be on the SG’s agenda going forward as a tool to keep everyone informed of the NANC’s activities.

Mr. Majkowski continued with the report. With respect to working group or IMG meeting minutes, Chairs should keep the NANC Chair’s web site updated with dates and meeting minutes – either quick summaries or complete minutes. Peter Guggina suggested development of instructions on how to do this and that submissions should be sent directly to John Manning at NANPA for posting to the NANC-Chair.org web page. Dan Hochvert suggested that there should also be a process for removal of materials to avoid cluttering the web page. Chairman Hoffman stated that the NANC Chair web site is intended as a convenience for this group. A calendar and summarized meeting records are posted there to keep people informed. One master calendar with all the related meetings will assist in avoiding meeting conflicts. Working Group Chairs are to assume responsibility to post items to the web page.

Legal Expertise WG Status. Five participants have been identified to be on the reconstituted working group: Megan Campbell, ATIS; Mike Slomin, Telcordia; John Goodman, Bell Atlantic; Terry Romine, ALTS; and Hank Hultquist, MCIWorldCom. Chairman Hoffman will send an e-mail to the group to confirm. Their first assignment is the analysis and legal review of the NeuStar response to the requirements document. This action item will be included in the NANC matrix. The Legal WG is open to more nominations.

The issue of unified messaging service issues was tabled for this meeting in Phil McClelland’s absence.

NARUC Travel Expense Funding. The SG discussed the funding of the state commission members. Current funding is for three commissioners and three staffers. There was discussion on whether funding should be extended to the NASUCA members and to the Cook County, IL State’s Attorney office, a nominee for a NANC seat. There was also discussion on whether the NANC should seek input formally on what entities should be offered NANC membership. The SG decided not to suggest going to the FCC to request a formal proceeding for NANC membership.

With respect to the cost of doing business, there was a suggestion to reduce the number of face to face meetings from 10 to 6 per year, with conference calls to be added as needed. There was discussion concerning the voluntary industry funding of the state commission seats, and the effect of adding the additional NARUC and NASUCA seats to

the Council. With respect to membership in general, any entity has the ability to petition directly to the Chief, CCB for membership. Representation on the NANC is determined by the Common Carrier Bureau.

Funding of a Consultant – Bonnie Baca. The SG discussed the proposed scope of the activity, the functions to be done and the job description. Chairman Hoffman was asked what are the requirements of the Chair. Chairman Hoffman gave the results of a poll taken on continued funding at the current level (13 in favor and 1 opposed); additional funding for “non-profits” (4 in favor and 9 opposed); and funding for a consultant (5 in favor and 8 opposed).

Chairman Hoffman stated that invoices were sent to 20 companies that were prior contributors. If any company wishes to contribute less than 1K and needs an invoice for processing, send an e-mail to the Chair and an invoice for a specific amount will be sent. This is funding for the three NARUC seats.

As background information as to how the NARUC funding began, Vincent Majkowski stated that in June 1997, the NARUC Board of Directors was approached concerning funding of his active participation on the Council. The NARUC Board determined that state participants on the NANC could accept travel fund reimbursement from the industry members, who contributed on a voluntary basis to a travel fund for that purpose. Brad Ramsay, NARUC, stated that two pending nominations for replacement NARUC members are conditioned on the availability of travel funds. Diane Harmon added that there is a desire to increase state participation, but so far the Bureau has not received the NARUC nominations. Ms. Harmon also clarified that there is no statutory or federal mechanism to fund the NANC membership.

Chairman Hoffman remarked that the expense reports and travel vouchers are submitted through the Chairman for review before payment. The funding of the NARUC members is totally voluntary.

Dan Hochvert stated that Bell Atlantic believes it is advantageous to have early input from all significant parties; there have been times when the NARUC and NASUCA positions have not been represented early enough – which results in the industry spending more time and money. Therefore, Bell Atlantic supports adequate funding to be available for NARUC and NASUCA participation.

Diane Harmon stated that the Bureau is prepared to replace the NARUC seats, but is interested in specific feedback from the NANC with regard to the Cook County Illinois nomination, Robert Ruiz, which would require travel reimbursement. Currently, the NASUCA members do not get reimbursed for travel expenses from the travel fund. The Bureau does not want to unilaterally impose a burden on the industry to fund another seat.

Harold Salters, PCIA, noted that voluntary contributions may not work going forward, and that the NANC may have to consider using another funding mechanism. Karen

Westrick, Omnipoint, added that funding should be for the three NARUC seats only. Peter Guggina stated that originally, NANC did not agree to fund all non-profits; the fund was established for three NARUC members. Chairman Hoffman stated that the travel cost amounts to approximately \$1K per state (1 commissioner and 1 staff member) per month.

Chairman Hoffman addressed the consultant issue, explaining that this would increase the need for industry funding contributions. The Chair was asked whether he needed assistance; the Chair, in turn, asked the Council whether it thinks he needs assistance; *i.e.* whether he is doing an adequate job without the additional support. No decision was reached on this issue and it was carried forward to the next meeting.

Concluding the SG report, Vince Majkowski gave his parting remarks, thanking the Council for the experience of working together on many issues and adding how much he appreciated the association.

Chairman Hoffman stated he will keep the NANC informed as it goes through the 1K pooling process, *i.e.*, resolution of the non-disclosure matter and whether there will be a NANC conference call scheduled before the next regularly scheduled meeting.

Disclaimer Statement for NANPA COCUS Update. Pat Caldwell read the proposed disclaimer. *NANPA exhaust projections contained herein may change based on demand for numbering resources and are subject to modification or revision by the NANPA as new data becomes available and is reported.*

Chairman Hoffman asked if the disclaimer is a reasonable heads up for the state regulators, and whether it is clear that you “can’t go to the bank” with these numbers. Exhaust projection is not an exact science. Erin Duffy approved of the disclaimer, adding that regulatory staff who work in this area have an understanding of the process and that the numbers are subject to change. As staff and commissioners, the best they can do is to make decisions based on the information that they have, and revisit when new data becomes available. It is understood that the numbers may change. Vince Majkowski added that NARUC members on the Council are more attuned to the volatility of such data. The disclaimer will assist colleagues who are not as familiar with this issue. Natalie Billingsley stated that a fairly clear disclaimer is needed – estimates and data will and do change over time.

It was recommended that the proposed statement be modified to read as follows: *NANPA exhaust projections contained herein may change, subject to numbering resource demand, and are subject to modification or revision by the NANPA as new data is available and analyzed.*

N. Other Business. Diane Harmon, DFO, made the following announcements. Several months ago, the NANC Alternate DFO, Jared Carlson was promoted to legal council to the Chief, Common Carrier Bureau. Jeannie Grimes has been selected as the Alternate DFO. Blaise Scinto, Deputy Chief, Network Services Division, has transferred

to the Policy Division, Wireless Telecommunications Bureau (WTB). Diane Harmon will step down as DFO to assume the duties of the Deputy Chief, NSD. Although not named as yet, Ms. Harmon stated she would assist the new DFO at the February NANC meeting. Ms. Harmon thanked Chairman Hoffman and the Council for the opportunity and experience working with them.

NANPA received a request from Guyana, South America to become part of the NANP and forwarded the letter to Chief, Common Carrier Bureau for advice in preparation for its response. In the letter dated January 5, 2000 to the NANPA, citing a strain on already scarce numbering resources, the CCB opined that the request should be denied. A copy of the letter will be circulated to the full Council.

O. Next Meeting: February 22-23, 2000.

VI. Action Items and Decisions Reached.

1. NANC Chair to meet with CCB leadership and report back to NANC about the meaning and impact of its decision regarding the New York Public Service Commission 914 NPA split.
2. NANPA Oversight Working Group. The NANPA Oversight WG will work with NANPA to develop and publish a disclaimer for the December 1999 NPA exhaust analysis.
3. NANPA Oversight Working Group. The working group will provide NANC with: (a) 1999 performance evaluation status in May 2000; (b) NANPA requirement document time line and project plan by mid-2000.
4. NANPA will clarify if utilization reporting is requested for the 2000 COCUS.
5. INC Report. NANC reached agreement that the reporting requirements relating to Reseller/Type 1 wireless carriers shall be for "sequential" TNs in quantities of at least 1000.
6. NANC agreed to form an IMG to address the two assumptions presented by INC's NANP Expansion Workshop (a) approve and implement the INC uniform dialing plan and (b) release of the D digit will not occur prior to NANP expansion. The IMG Co-Chairs are Trent Boaldin, OPASTCO and Beth Kistner, ALTS. The IMG will report back at the February 22-23 NANC meeting with its initial assessment of the work effort. IMG is ultimately to prepare a recommendation for NANC approval and forwarding to the FCC.
7. Norm Epstein (GTE) will prepared a response to the Ad Hoc letter (NANC #20) for NANC Chair and NANC review prior to sending out.

8. Number Pooling IMG will provide the NANC with a memo that describes the details associated with its recommendation to the NANC of the latest proposal for the PA function.
9. NeuStar and NANC Chair to resolve existing non-disclosure issue by January 21st.
10. The Legal Expertise Working Group has been reconstituted. Its first assignment is to review the NeuStar response to the PA Requirements Document. Participants include Hank Hultquist, MCIWorldCom (Chair); Terry Romine, ALTS, James H. Bolin, Jr., AT&T; John Goodman, Bell Atlantic, and Mike Slomin, Telcordia. The review should be completed by January 28th.
11. The NANC decision on the PA recommendation will be addressed via conference call or at the next NANC meeting based on IMG input.